

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

**C.A. No. 04-10353-PBS**

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR

Defendants.

**DEFENDANTS' RESPONSE TO PLAINTIFF'S  
MOTION FOR LEAVE TO AMEND COMPLAINT**

Defendant Voice Signal Technologies, Inc. (“VST”) responds to Plaintiff’s Motion for Leave to Amend Complaint by stating that it takes no position concerning the Court’s determination of the Motion, but alerts the Court that the Amended Complaint filed with Plaintiff’s Motion asserts the exact same claims for relief and exact same predicate facts which were asserted in the initial Complaint, and which the Court dismissed without prejudice. If Plaintiff’s Motion is granted, VST intends to move to dismiss Counts II through V of the Amended Complaint on the same grounds that those counts were dismissed from the original Complaint.

Respectfully submitted,

VOICE SIGNAL TECHNOLOGIES, INC.

By their attorneys,

Paul E. Bonanno /s/

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Dated: May 26, 2004

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